

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
ORANGEBURG DIVISION**

MEADWESTVACO CORPORATION, <i>et al.</i>)	
)	
<i>Plaintiffs</i>)	Civ. A. No. 5:11-601-MBS
)	
)	
<i>v.</i>)	Subpoena in Civil Action No.
)	1:10-CV-511-GBL-TRJ
REXAM PLC, <i>et al.</i> ,)	Pending in the United States
)	District Court for the
<i>Defendants</i>)	Eastern District of Virginia

**PLAINTIFFS' MOTION TO COMPEL TESTIMONY
OF "ABC CORPORATION"**

Plaintiffs MeadWestvaco Corporation and MeadWestvaco Calmar, Inc. (collectively, “MWV”), by counsel and pursuant to Federal Rules of Civil Procedure 30, 37, and 45, hereby move the Court to compel ABC Corporation to provide a further witness able to testify knowledgeably and completely regarding topics 1, 2, 3, 6, and 9 of MWV’s deposition subpoena.

The grounds for this Motion are set forth in the accompanying Brief, which MWV has applied to file under seal.

Counsel for MWV certifies that a good-faith effort has been made to resolve this Motion without Court intervention. After the subject deposition, counsel for MWV sent counsel for ABC Corporation a letter detailing the deficiencies in the deponent’s testimony, and counsel for ABC Corporation responded and refused in two separate communications to acknowledge or produce further testimony to resolve said deficiencies.

WHEREFORE, MWV moves that its Motion to Compel be granted.

Dated: June 17, 2011

Respectfully submitted,

MEADWESTVACO CORPORATION
MEADWESTVACO CALMAR, INC.

By: /s/ David H. Koysza

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of June, 2011, a true and correct copy of the foregoing pleading or paper was served by hand upon:

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